

**Testimony Before the NCVHS subcommittee on Standards and
Security Regarding Coding for Naturopathic Medical Services
1/29/03**

**Konrad Kail, P.A., N.D.
Director
Southwest College Research Institute
Tempe, AZ
(602) 363-9237
kkail@cox.net**

I would like to thank the Chairman and members of the subcommittee for the opportunity to bring testimony before you. I am a naturopathic physician and have a family practice in Phoenix, Arizona. I am a member of the Advisory Council to the NIH National Center for Complementary and Alternative Medicine. I am also the liaison to the Cancer Advisory Panel for Complementary and Alternative Medicine at the National Institutes of Health. I am involved in several multi-specialty health networks and co-manage patients with conventional physicians. I am here on behalf of the American Association of Naturopathic Medical Colleges (located here in Washington D.C.) and the Southwest College of Naturopathic Medicine and Health Sciences located in Tempe, Arizona.

This submission discusses the training, licensure, practice and insurance reimbursement of naturopathic physicians. Naturopathic physicians provide primary care for patients of all ages. We utilize conventional diagnostic techniques including physical examination, laboratory evaluation, diagnostic imaging and pathologic diagnosis. Assessment may include determination of nutritional status and toxic burden. Additionally, the patient's mental, emotional, social and spiritual status is evaluated.

Traditional naturopathic therapeutics include lifestyle interventions, the prescription of natural medicines of animal, mineral and plant origin, therapeutic diet, homeopathy, physical modalities and counseling. Naturopathic physicians are also trained to provide in office minor surgical procedures, administer vaccinations and prescribe a range of drugs. We refer for evaluation and management

by specialists, using the same criteria as conventional primary care providers. Naturopathic physicians meet public health requirements and in utilizing a primary care model, work with a multi-specialty referral network of other providers. A natural evolution of naturopathic care models has resulted in the emergence of integrated clinics that include the full gamut of licensed provider types (ND, MD, DO, DC, LAc, ARNP, LM, ...).

Naturopathic principles of care and philosophy serve as the bases for naturopathic practice and guide the practitioner in utilizing the least invasive, most efficacious and cost effective level of intervention. The goals of care include direct patient management, education in self-care, disease prevention and health promotion through restoration of normal physiology to the greatest extent possible.

Evaluation and management, as well as procedure codes, ideally describe the actual service provided. It is hoped that an understanding of how naturopathic physicians practice will aid in the code development process undertaken here by the committee.

Naturopathic Medicine

Naturopathic Medicine is a unique and distinct system of health care that emphasizes the use of prevention and natural therapeutics. The doctors who practice naturopathic medicine, called *naturopathic physicians* (NDs), are trained to serve as primary care general practitioners who are experts in the prevention, diagnosis, management, and naturopathic treatment of both acute and chronic health conditions.

In the United States, the naturopathic profession's infrastructure is based on accredited educational institutions, professional licensing by a growing number of states, national standards of practice and care, peer review, and an ongoing commitment to state-of-the-art scientific research. Modern American naturopathic physicians receive extensive training in and use therapies that are primarily natural and nontoxic, including clinical nutrition, homeopathy, botanical medicine, hydrotherapy, physical medicine, and counseling. Many NDs have

additional training and certification in acupuncture and natural childbirth. Naturopathic physicians practice medicine as primary health care providers and are increasingly acknowledged as leaders in bringing about progressive changes in the nation's medical system.

Without exception, all laws that have licensed naturopathic physicians (both historically and currently) establish educational standards that are recognized as the highest available when the laws were enacted. Naturopathic physicians are trained at accredited, four-year, post-graduate, residential naturopathic medical programs. Today, the highest educational standard available for the naturopathic profession is graduation from a four-year, residential naturopathic medical school that has been accredited by the Council on Naturopathic Medical Education.

The traditionally regulated scope of practice for a licensed naturopath has remained consistent since the profession's founding in the early 1900's although some changes have been made to reflect societal changes and scientific advances. The naturopathic physician's scope of practice continues to include diagnosis and treatment of patients by using light, air, water (hydrotherapy), botanical medicine, homeopathy, clinical nutrition, physical medicine, and lifestyle counseling.

Naturopathic medicine is defined by its fundamental principles. Methods and modalities are selected and applied based upon these principles in relationship to the individual needs of each patient. Diagnostic and therapeutic methods are selected from various sources and systems, and will continue to evolve with the progress of knowledge.

The earliest doctors and healers worked with herbs, foods, water, fasting, and tissue manipulation - gentle treatments that do not obscure the body's own healing powers. Today's naturopathic physicians continue to use these therapies as their main tools and to advocate a healthy dose of primary prevention. In addition, NDs conduct and make practical use of the latest biochemical research

involving nutrition, botanicals, homeopathy, and other natural treatments.

For many diseases and conditions (a few examples are ulcerative colitis, asthma, menopause, flu, obesity, and chronic fatigue), treatments used by naturopathic physicians can be primary and even curative. Naturopathic physicians also function within an integrated framework, for example referring patients to an appropriate medical specialist such as an oncologist or a surgeon. Naturopathic therapies can be employed within that context to complement the treatments used by conventional physicians. The result is a team-care approach that recognizes the best overall treatment most appropriate to the patient's specific medical condition.

The current scope of naturopathic practice includes, but is not limited to:

Clinical Nutrition

- That food is the best medicine is a cornerstone of naturopathic practice. Many medical conditions can be treated more effectively with foods and nutritional supplements than they can by other means, with fewer complications and side effects. Naturopathic physicians use dietetics, natural hygiene, and nutritional supplementation in practice.
- The discovery of vitamins, minerals and deficiency diseases in the early part of the 20th century began to provide a scientific understanding of clinical nutrition. The realization that enzyme systems were dependent on essential nutrients provided the naturopathic profession with great insights into the importance of an organically grown, whole foods diet for health.
- Nutritional biochemist Roger Williams' formulation of the concept of biochemical individuality in 1955 further developed insights into the unique nutritional needs of each individual, how to correct in-born errors of metabolism, and even how to treat specific diseases through the use of nutrient-rich foods or large dosages of specific nutrients. Linus Pauling, two-time Nobel Prize winner, coined the concept of orthomolecular medicine,

and provided further theoretical substantiation for the use of nutrients as therapeutic agents."

- Naturopathic physicians are the only health care professionals that meet and exceed the recommendations of former US Surgeon General Koop for education in nutrition. Naturopathic physicians frequently use nutritional supplements as part of a patient's treatment.
- The dietary approach to prevention and treatment of chronic degenerative disease, championed for more than a century by naturopathic physicians, has recently gained the attention of conventional medicine. Each of the seven dietary guidelines in the 1988 U.S. Surgeon General's report on nutrition and health is a traditional part of naturopathic practice. More than 40 scientific journals worldwide are devoted to clinical nutrition, and articles on the therapeutic use of diet or supplements also appear regularly in conventional medical journals.

Botanical Medicine

- Many plant substances are powerful medicines. Where single chemically derived drugs may only address a specific problem, botanical medicines are able to address a variety of problems simultaneously. Their organic nature makes botanicals compatible with the body's own chemistry; hence, they can be gently effective with few toxic side effects.
- Naturopathic physicians use plant material for food, medicine and health promotion. Formal training includes plant identification, preparation, storage, therapeutic indications, contraindications and dosing. There is extensive contemporary medical literature on medicinal and healing plants. Nothing in naturopathic licensing laws prevents the use of plant medicines by any other individual or group.
- Most European countries recognize the effectiveness of medicinal plants, include them in their official pharmacopoeias and regulate them as drugs or over-the-counter remedies. At least 14 scientific journals worldwide are devoted to the study of botanical medicine.
- **Naturopathic Formulary:** Naturopathic formulary is usually a part of rules and regulations rather than law that list those prescriptive substances which naturopathic physicians use in

practice. Much of the prescriptive pharmacy is based on naturally derived substances. Further, giving naturopathic physicians prescriptive rights saves patients money and time by not requiring a visit to another physician when a simple prescription is indicated. Giving a regulatory board the ability to create the list, the formulary, clarifies to legislators, pharmacists, naturopathic physicians and other practitioners the legal scope of naturopathic prescribing. The list is composed of those substances that are in the traditional pharmacopoeia of naturopathic medicine.

- The curriculum of naturopathic medical schools includes extensive training in clinical pharmacology. Courses cover the use of legend drugs as well as nonprescription agents, botanicals, antibiotics, hormones, vitamins and minerals.

Homeopathic Medicine

- Homeopathic medicine is based on the principle of "like cures like." It works on a subtle yet powerful electromagnetic level, gently acting to strengthen the body's healing and immune response.
- Homeopathic medicines are made from natural substances and stimulate the body's immune and defense system to initiate the healing process.
- Naturopathic medical schools teach homeopathic therapeutics as a standard part of the curriculum. Naturopathic schools offer training in homeopathy to the same high standard of Canadian or European schools.
- Homeopathy is a system of medicine more than two hundred years old and there are more than one hundred homeopathic medical colleges worldwide. A recent review article in the British Medical Journal performed a meta-analysis of 107 controlled clinical trials of homeopathic substances, and found positive evidence supporting their effectiveness (Kleijnen; see also: Alibeu; Ferley; Gassinger; Gibson; Maiwald; Reilly; Vozianov; Weisenauer). In the most significant and comprehensive review of homeopathic research ever conducted, The Lancet published a meta-analysis of 89 blinded, randomized, placebo-controlled clinical trials and concluded that the homeopathic medicines in the studies had a 2.45 times greater effect than placebo. The authors of the research include Klaus Linde, MD, and Wayne Jonas, MD, former director of the NIH Office

of Alternative Medicine. (The Lancet, September 20, 1997) Various other in vitro or animal studies have also demonstrated the effectiveness of homeopathic preparations (Bildet; Poitevin; Sukul; Wagner).

Physical Medicine

- Naturopathic Medicine has its own methods of therapeutic manipulation of muscles, bones, and spine. NDs also use ultrasound, diathermy, exercise, massage, water, heat and cold, air, and gentle electrical pulses.
- Naturopathic Manipulative Therapy (NMT) has been an integral part of the practice of naturopathic medicine since the founding of the naturopathic profession, and throughout its existence. It is part of every current naturopathic licensing law. Manipulative therapy is a large, international, interdisciplinary science practiced by a multitude of professions. This is important to understand because some systems of medicine want to co-opt manipulative therapy for their exclusive use.
- The chiropractic system of spinal adjustment is only one of many systems of spinal manipulation, as is NMT. Naturopathic manipulative therapy is performed and prescribed as a "therapy". That is, it is used for a specified therapeutic effect and is not conceived of as the final act of anatomical approximation of a displaced bone. Rather, it is conceived of as dynamic process having specific therapeutic benefits.
- The training of naturopathic physicians in NMT and related fields is extensive. Students receive approximately 348 hours of instruction in NMT. Of these, 132 hours are devoted strictly to the hands-on learning of technique. In addition, elective course work is available for students wishing greater expertise in this area.
- Naturopathic manipulation of the muscles, bones and soft tissues is collectively known as Naturopathic Manipulative Therapy (NMT). Physical medicine also includes exercise therapy, physiotherapy using heat and cold, electrical pulsation, ultrasound, diathermy and hydrotherapy. Such techniques are regularly evaluated in journals such as the *Journal of Manipulative and Physiological Therapies*. A recent study in England found manipulative treatment to be more effective than orthodox medical treatment for certain kinds of back injuries

(Meade). The value of such treatments is recognized in other licensed professions such as physical therapy, osteopathy, chiropractic, and massage therapy.

Hydrotherapy

- Hydrotherapy is the use of hot and cold water for the maintenance of health and treatment of disease. These are therapies that stimulate circulation and healing, often with the only other effect being cleanliness. Naturopathic medicine is in part rooted in the European hydrotherapy movement, centuries old and still thriving.
- The best-known American hydropath was John Harvey Kellogg, a medical doctor who approached hydrotherapy scientifically and performed many experiments to determine the physiological effects of hot and cold water. His book, *Rational Hydrotherapy*, is considered one of the definitive texts on the therapeutic effects of water. It also has an extensive discussion of the actual techniques.
- The value of water treatments, fasting and rest in treatment for chronic disease is recognized throughout the developed countries in Europe. About a half million French citizens each year receive insurance reimbursement for medically prescribed spa therapy.

Acupuncture and Traditional Chinese Medicine

- Acupuncture and Traditional Chinese Medicine (TCM) are complimentary healing philosophy to naturopathic medicine. Meridian theory offers an important understanding of the unity of the body and mind, and adds to the Western understanding of physiology. Acupuncture provides a method of treatment, which can unify and harmonize the imbalances present in disease conditions, which, if untreated, can result in illness. The eclectic base of the modern naturopathic practices offers simple, effective acupuncture treatments for a wide variety of health problems. NDs are trained with entry-level acupuncture competency. Many continue studies that certify them as specialists.

- An individual naturopathic physician may or may not have the same in-depth training as an acupuncturist, who is the kind of specialist to which referrals are made. Every ND receives appropriate training to utilize acupuncture in an eclectic practice. An ND wanting to specialize in acupuncture will have training similar to any other acupuncturists at the level required for certification by the National Commission on the Certification of Acupuncturists.
- All naturopathic physicians are trained at an introductory level in the basics of Oriental medicine, and about one in five receives further training and specializes in it. Oriental medicine has been developed continuously for more than three thousand years in Asia and coexists along with conventional medicine today in China and Japan as a primary form of medicine. Dozens of peer-reviewed journals are devoted to the scientific evaluation of Oriental methods, including both acupuncture and botanical medicine.

Naturopathic Obstetrics

- Naturopathic physicians provide natural childbirth care in an out-of-hospital setting. They offer prenatal and postnatal care using modern diagnostic techniques. The naturopathic approach strengthens healthy body functions so that complications associated with pregnancy may be prevented.
- Naturopathic physicians have a long history in safe at home childbirth. Those naturopathic physicians certified in the specialty of naturopathic obstetrics (natural childbirth) are trained to perform the following:
 - Episiotomy, including its repair
 - Repair of current obstetric laceration of cervix
 - Repair of other current obstetric laceration (includes only repair of perineum, vagina, and vulva)
 - Circumcision, in newborns only

Mind-Body Medicine

- Mental attitudes and emotional states may influence, or even cause, physical illness. Counseling, nutritional balancing, stress

management, hypnotherapy, biofeedback, and other therapies are used to help patients heal on the psychological level.

- The training of naturopathic physicians includes counseling. The ND must be able to talk with patients in a constructive way about lifestyle, stresses, and habits. As a rule, naturopathic physicians spend one half to one and a half hours with a patient on the first visit. They gather a medical history, as well as a family history. They get data on lifestyle and stress, means of relaxation, diet, and exercise. They ask the patient when each symptom began and what was happening in his or her life at the time. They try to uncover the cause or causes of the symptoms or imbalance and to discover the blocks that keep the patient from necessary change. Again, nothing in any naturopathic licensing bill interferes with the scope of any other practitioner.
- Naturopathic physicians are trained in various psychological techniques, including basic counseling, stress management, hypnotherapy, biofeedback, and methods of lifestyle modification. A large body of scientific literature points to the importance of treatment for psychological and somatic factors and coping mechanisms in many illnesses and complaints.

Minor Surgery

- As general practitioners, NDs do in office-minor surgery including repair of superficial wounds, removal of foreign bodies, cysts, and other superficial masses.
- Naturopathic physicians are primary care doctors and need the limited authority to remove foreign objects (excepting from areas that are higher risk and require specialty training). We take slivers out of kid's hands. When trained in obstetrics stitching episiotomies are necessary. Most naturopathic physicians refer most minor surgery.

The following represents the general scope of naturopathic minor surgery. All licensable naturopathic physicians are trained to perform the following:

- A. Operations on skin and subcutaneous tissue

1. Incision of the skin and subcutaneous tissue (example: Aspiration of abscesses, hematomas, and seromas of the nail, skin or subcutaneous tissue; incision of pilonidal sinus or cyst; other incision with drainage of skin and subcutaneous tissue [excludes fascial compartments of face and mouth, palmer and thenar space]; incision with removal of foreign body from skin and subcutaneous; other incision of skin and subcutaneous tissue [exploration of sinus tracts, skin, subfacial fossa and the undercutting of hair follicles; excludes fascial compartments of face and mouth, palmer and thenar space]).
 2. Excision or destruction of lesion or tissue of skin and subcutaneous tissue (example: Debridement of wound, infection, or burn [includes only minor wounds, infections or burns]; removal of nail, nailed, or nail fold; ligation of dermal appendage).
 3. Other local excision or destruction of lesion or tissue of skin and subcutaneous tissue (example includes the removal of moles, warts, and cysts; and the destruction of tissue by cauterization, cryosurgery, fulguration, or laser beam. Excludes Z- plasty).
 4. Suture of skin and subcutaneous tissue (example: replantation of scalp, including suturing of incisions, excisions, and minor wounds of the scalp; suture of skin and subcutaneous tissue of other sites, including suturing of incision, excisions, and minor wounds).
- B. Lingual frenotomy, excluding lingual frenectomy.
 - C. Labial frenotomy, excluding labial frenectomy.
 - D. Excision or destruction of lesion or tissue of scrotum (includes only the treatments of benign lesions such as warts).
 - E. Local excision or destruction of lesion of penis (includes only treatment of benign lesion such as warts).
 - F. Destruction of lesion of cervix by cryosurgery (includes only treatment of benign lesions).
 - G. Hymenotomy
 - H. Excision or destruction of lesion of vagina (includes only treatment of benign lesion such as warts).
 - I. Excision or destruction of vulva and perineum (includes only treatment of benign lesions such as warts).

- J. Incision or excision of perianal tissue
 1. Incision of perianal abscess;
 2. Excision of perianal skin tags;
 3. Other excision of perianal tissue (includes only treatment of benign lesions such as warts).
- K. Procedures on hemorrhoids
 1. Injection of hemorrhoids;
 2. Cauterization of hemorrhoids;
 3. Destruction of hemorrhoids by cryotherapy;
 4. Ligation of hemorrhoids;
 5. Evacuation of thrombosed hemorrhoids.

Diagnostic Imaging

- As primary care practitioners Naturopathic physicians have the need access to diagnostic tools used routinely in general practice. These include x-ray, ultrasound, mammography, etc. Often naturopathic physicians do not perform these tests, but need the flexibility to order them.
- For example: Naturopaths routinely do breast exams, pelvic exams and pap smears. Inability to order a routine mammogram results in additional cost to a patient if she must pay an MD for the visit so that a test can be ordered. It can result in late diagnosis if the patient refuses to see an MD which some do. Naturopathic physicians are trained to follow the reports and refer appropriately as would any primary care physician.
- The training and testing of naturopathic physicians cover all these procedures.

Naturopathic Medicine Education

The degree of Doctor of Naturopathic Medicine requires four years of graduate level study in the basic sciences and clinical medicine, and clinical training. Naturopathic medical colleges are four-year postgraduate schools with admissions requirements comparable to those of conventional medical schools. A minimum of three years of undergraduate premedical study is prerequisite for entry to a naturopathic medical school. The course of study is an intensive

four-year graduate program including approximately 4,500 hours of academic and clinical training. The program leads to licensure as a Doctor of Naturopathic Medicine (ND or NMD in Arizona). It is important to distinguish certified naturopathic physicians from non-certified who have completed just a short-term course-work mostly by correspondence.

Naturopathic medicine is at the forefront of the alternative and complementary healthcare movement as it evolves today, and naturopathic physicians are the most comprehensively trained doctors of natural medicine. Comparative Curricula: Naturopathic and Major Conventional Medical Schools

**National Bastyr Southwest John
College University College Hopkins Yale Stanford**

**Basic and
Clinical
Sciences**

Anatomy, Cell
Biology,
Physiology,
Pathology,
Neurosciences,
Clinical /
Physical
Diagnosis,
Histology,
Genetics
Biochemistry,
Pharmacology,
Lab Diagnosis,
Pharmacognosy,
Public Health,
History,
Philosophy,
Ethics,
Research and
other

coursework.	1548	1639	1419	1771	1420	1383
Clerkships (1)	2244	1925	1920	3391	2891	3897

**and Allopathic
Therapeutics**

Lecture and
Clinical
Instruction in
Dermatology,
Family Medicine,
Psychiatry,
Internal
Medicine,
Radiology,
Pediatrics,
Obstetrics,
Gynecology,
Neurology,
Surgery (2),
Ophthalmology,
and Clinical
Electives.

**Naturopathic
Medicine**

Naturopathic

Philosophy

72

55

60

--

--

--

Therapeutic

Nutrition (3)

144

132

130

--

--

--

Counseling (4)

144

143

100

--

--

--

Botanical

Medicine

96

110

120

--

--

--

Homeopathy

144

88

140

--

--

--

Acupuncture

TCM

72

33

200

--

--

--

Hydrotherapy

48

39

40

--

--

--

Naturopathic

Manipulative

Therapy

156

176

180

--

--

--

Ayurvedic

Medicine

--

22

20

--

--

--

Naturopathic

Case Analysis /

Management

--

66

120

--

--

--

(5)						
Advanced Naturopathic Therapeutics	--	44	20	--	--	--
Subtotals:	876	908	1130	0	0	0
Total Reported Hours:	4668	4472	4469	5162	(+ thesis) 4311	5280

**Comparison on Course Work - Recommended by US Surgeon
General**

Naturopathic Physician (ND)	Registered Dietician (RD)	Medical Doctor (MD)
--------------------------------	------------------------------	------------------------

Biochemistry and physiology

345	120	398
-----	-----	-----

Basic nutrition, nutrition assessment and interpretation

72	108	21
----	-----	----

Diet and disease; therapeutic diets

128	72	0 (i.)
-----	----	--------

Counseling

150	36	0 (ii.)
-----	----	---------

Internship in diet and disease

1300 (v.)	900 (iv.)	0 (iii.)
-----------	-----------	----------

TOTALS

1995	1236	419
------	------	-----

1. MD's receive about 96 hours of psychiatric clerkship, and are not likely to include behaviorally oriented counseling
2. A dieticians hours in therapeutic diets may be performed in food management rather than clinical nutrition
3. Naturopathic internship includes dietary evaluation and treatment in most patients.
4. Clerkships are estimated to be 40 hours of mixed lecture and clinical training.
5. No dedicated coursework in therapeutic nutrition appears in the college catalogs of Hopkins, Yale or Stanford, although they indicate that the subject is addressed in other courses.
6. Totals for John Hopkins, Yale and Stanford are included in psychiatry coursework.

Comparing Training in Nutrition

Training in nutrition and lifestyle modification, in both classroom and clinical settings, has been part of the core curriculum of naturopathic physicians since the profession was organized in the United States in 1902. Naturopathic physicians are the only licensed primary health care providers with extensive training in therapeutic diets and preventive nutrition.

Coursework Recommended by U.S. Surgeon General	Naturopathic Physician	Registered dietitian	Medical Doctor
Biochemical and Physiology	321	120	369
Basic nutrition, nutrition assessment and interpretation	48	108	Elective
Diet and disease; therapeutic diets	84	7	0 (1)
Counseling	130	36	0 (2)
Internship	1342 (3)	900 (4)	0 (5)
National / State Exams	yes	yes	no (6)
Total Hours:	1925	1171	396

Training Summary of Selected Medical Professionals

Licensed Practical Nurse	Registered Nurse	Advanced Registered Nurse Practitioner	Physician's Assistant	Physician	Naturopathic Physician
9 months to 2 year practical nursing program (1 year most common)	<p>(ONE of the following)</p> <p>2-yr. associate's degree</p> <p>3-yr. diploma program, (hospital based)</p> <p>4-yr. bachelor's degree in nursing</p> <p>4-yr. bachelor's degree in another discipline AND 3-yr. Master's degree in nursing</p> <p>4-yr. Bachelor's degree in another</p>	<p>(ONE of the following)</p> <p>In addition to holding a license as a Registered Nurse, an A.R.N.P. completes:</p> <p>9 month to 2 yr. Certificate program in specialty</p> <p>2-yr. Master's degree certified in specialty</p>	4-yr. Bachelor's degree AND 18 to 24 months master's degree (must work under the supervision of a physician)	4-yr. Bachelor's degree in pre-med AND 2 to 5 years of post-graduate training; internship, residency	3 to 4-years of college with coursework in sciences AND 4-yr. Naturopathic medical degree

Formatted Table

	discipline AND 4-yr. Nursing Doctorate program				
--	--	--	--	--	--

Licensure of Naturopathic Physicians

Naturopathic physicians are licensed in Alaska, Arizona, Connecticut, Florida, Hawaii, Maine, Montana, New Hampshire, Oregon, Utah, Vermont, Washington, and Puerto Rico and have a legal right to practice in Kansas, Idaho and the District of Columbia. Naturopaths also practice in other states without official government sanction; however, without licensing standards individuals with little or no formal education may proclaim themselves naturopathic physicians without medical school education or board testing.

The Council of Naturopathic Medical Education (CNME) serves as the programmatic accrediting agency for naturopathic medical programs. Graduates of four-year programs that lead to the Doctor of Naturopathic Medicine degree from accredited or pre-accredited (candidacy) by CNME are eligible to apply for the naturopathic licensing examinations administered by the North American Board of Naturopathic Examiners.

A licensed naturopathic physician (ND) attends a four-year graduate level naturopathic medical school and is educated in all of the same basic sciences as an MD but also studies holistic and nontoxic approaches to therapy with a strong emphasis on disease prevention and optimizing wellness. In addition to a standard medical curriculum, the naturopathic physician is required to complete four years of training in clinical nutrition, acupuncture, homeopathic medicine, botanical medicine, psychology, and counseling (to encourage people to make lifestyle changes in support of their personal health). A naturopathic physician takes rigorous professional board exams so that he or she may be licensed by a state or jurisdiction as a primary care general practice physician.

Twelve states, and Puerto Rico, license naturopathic physicians. Five of these states have continuously licensed NDs since the early

twentieth century. All the state licensing laws include title protection, exam requirements, general qualification requirements, scope of practice definitions, integration into the public health system through reporting requirements, and creation of peer review mechanisms.

An evaluation by an independent body of medical school examiners from the Oregon Office of Educational Policy and Planning drew this conclusion: Naturopathic medical college prepares a ND with biological and biomedical education of the same breadth and depth that prepares a MD to be primary care physician.

In states that license naturopathic medicine, NDs refer and co-manage cases with conventional providers, and are rapidly integrating into the established healthcare delivery system. Complaints are few. Malpractice awards almost non-existent

In every state that licenses naturopathic doctors, the safety record of the naturopathic profession is superior to that of the allopathic medical profession. Since naturopathic medicine is less invasive therapeutically, it inherently puts the patient at less risk. Further, licensing actually protects the public safety by creating a defined scope of practice, authorizing regulatory oversight and providing recourse for complaints. Licensed NDs can be held to the same public health and OSHA standards as other licensed health care providers.

Licensing NDs is consistent with the current practice of licensing other primary care providers, including medical doctors, doctors of chiropractic, osteopathic physicians, and licensed acupuncturists, as well as all other health care providers including dentists, optometrists, nurses, etc. The American Association of Naturopathic Physicians (AANP) is the only national professional association in the U.S. for licensed and licensable NDs. The AANP strongly believes in and advocates for state licensing of naturopathic physicians in all 50 states.

Insurance Coverage for Naturopathic Physicians

State and provincial government audits, insurance company rate policies, and measures of utilization all find naturopathic medicine to

be cost-effective when compared with orthodox medicine and high hospital fees. In 1989, the state of Hawaii audited health costs associated with naturopathic medicine and concluded that there was no evidence that naturopathic medicine increased health care costs. ("Study of proposed mandatory health insurance for naturopathic care", Legislative Auditor of the State of Hawaii. Report # 89-25, December 1989.)

The British Columbia government Medical Services Plan audited naturopathic practice in that province in 1988 (MSP). The audit showed naturopathic medicine to be cost-effective and, Minister of Finance Mel Couveleir concluded: "The government will attempt to control health-care costs by emphasizing holistic and preventive medicine."

- Most people (67%) believe the availability of alternative care is an important selection criterion in their choice of a health plan. *Landmark Report on Public Perceptions of Alternative Care*, 1998, Landmark Healthcare, Inc.
- Nearly one-half of adults in the US say they would be willing to increase their monthly health care expenses in order to have access to alternative care. *Landmark Report on Public Perceptions of Alternative Care*, 1998, Landmark Healthcare, Inc.
- Audits of naturopathic services and surveys of insurance companies have indicated that naturopathic medicine is less expensive than conventional care, perhaps by as much as half. The actual savings may be much higher, because none of the audits measured the long-term effect of the naturopathic preventive approach in reducing costs associated with serious chronic disease. *Naturopathic Medicine: Contribution to Health Care Reform*, 1993 American Association of Naturopathic Physicians.
- Over 70 companies, unions and state organizations have health plans that cover naturopathic medical services.

Naturopathic medicine offers inexpensive therapeutic options to over utilized expensive conventional procedures. Hysterectomy, prostate

surgery, tonsillectomy, myringotomy, and many other procedures have been found by insurance reviewers and other cost-control experts to be frequently overused (Califano; EBRI; Ellwood; Rand). An article in a 1991 issue of the Journal of the American Medical Association suggests that medical costs could be reduced by up to 20% by reducing the rate of interventional medicine and unnecessary surgery (Gleicher).

1. At American Western Life, which grosses 54 million a year, insiders say they are already making money with the plan that covers naturopathic services but expect the biggest savings occur in the future because preventive care will help stave off high priced claims.
2. The inclusion of naturopathic medical services, supported by appropriate state and federal laws and regulations, in the array of medical services offered to consumers, may lower overall health costs through increased competition.
3. More than 90 [insurance carriers](#) cover naturopathic medicine in the United States and Canada. Also, state legislatures in Connecticut, Hawaii, and Alaska have mandated insurance reimbursement for naturopathic medical services.
4. The Hawaii state Auditor's office hired actuarial firm, the Wyatt Company, to survey 24 underwriters of indemnity medical plans. Wyatt found that most companies do not raise their rates in states where naturopathic physicians are included. Those companies that do raise their rates typically charge an extra one to three cents a month on private plans, and nothing extra on group plans.
5. There is no evidence that NDs drive up utilization inappropriately. Patients who utilize naturopathic services in North America see their physicians about three times per year (AANP). The national average for patients who use M.D.S. is between five and six visits per year, and for a chiropractor about eight visits (HCFA). Patients' visits remain about the same in states without mandatory insurance reimbursement: 3.5 visits per patient in Washington state; 2.5 per patient in Arizona; and 3.6 per patient in North Carolina (AANP).

6. Malpractice suits against naturopathic physicians are extremely rare. Master Insurance Trust reports that in a four-year history involving 50 licensed naturopathic physicians only 4 incidents were reported and nothing was paid in judgment or settlements.
7. Federal commission studying medical malpractice estimated malpractice costs passed from doctor to patient increased 10 fold during the 1970s. These cost have continued to rise with the present 28 billion a year in malpractice representing \$400,00 per MD in indirect costs.

Medicaid Coverage

The majority of state Medicaid programs provide some coverage of alternative therapies for children in low-income families, according to a new study from the University of Michigan. Medicaid representatives from 46 states were interviewed in the study, which reveals that chiropractic is reimbursed in 74 percent of the states, biofeedback in 22 percent, acupuncture in 15 percent, hypnosis in 13 percent, and naturopathy in 11 percent. The states, on average, currently spend less than \$500,000 per year on alternative therapies for Medicaid recipients; seven states plan to expand alternative medicine coverage in the next 3 years.

Source: Steyer TE, Freed GJ. Variation in Medicaid reimbursement patterns for alternative therapies. Presented at: Advancing Children's Health 2000, Joint Meeting of the Pediatric Academic Societies and the American Academy of Pediatrics; Boston, MA; May 13, 2000. Accessed at <http://www.abstractson-line.com/abstracts/pas/login.asp?Num=0%2E6401178>

Integrative Medicine Communications is dedicated to helping

healthcare
practitioners combine the best of complementary and alternative
therapies
with conventional medicine. For more information about our products
and
services, please go to: <http://www.onemedicine.com>
©2000 by Integrative Medicine Communications

Insurance Issues for Naturopathic Practice

Because naturopathic services are health care and maintenance services, it is important that this be discussed. We want you to understand clearly that this is a licensing bill and NOT a bill asking for insurance third party reimbursement. Insurance issues include those of liability insurance for the practitioner and consumer access to insured naturopathic care. Washington State is being watched by the nation following the directive from its insurance commissioner to cover every category of licensed provider. The states of Hawaii, Arizona and Connecticut require insurance parity for naturopathic physicians. In the state of Montana the insurance commissioner's policy is that if coverage for primary care is provided, naturopathic physicians must be covered as the law defines them as practicing a primary care system of medicine.

It is important in this time of great concern over health care to remember that "conventional" medicine is not a health care system. It is at best an early detection and "disease management" system. Because of this, our health care costs get higher and yet we as a population get sicker. This is why one out of every three Americans is seeking an alternative approach to medicine (Eisenburg, NEJM 1993). A naturopathic physician is a primary care physician who focuses on wellness and disease prevention.

- making naturopathic medicine a service with [cost effectiveness](#)
- making their patients good insurance risks ([coverage](#)) because they are concerned with prevention;
- making naturopaths good risks for [professional liability](#) insurance because they have close relationships with patients, use safe therapies and are not performing invasive procedures;

- and making naturopathic physicians an obvious part of any managed care system that seeks to assure quality services while limiting costs.

Professional Liability Insurance

Naturopathic physicians cannot purchase malpractice insurance in unlicensed states. Wouldn't it protect your constituents for this coverage to be available?

Two U.S. insurance companies provide coverage designed for naturopathic physicians. [Master Administrative Services, Inc.](#) administers policies for naturopathic physicians located in states that provide licensure to naturopathic physicians.

The [MGIS Companies](#) administered medical -professional liability insurance designed specifically for naturopathic physicians for eight years. They found the loss experience for naturopathic physicians compares extremely favorably with that of other health care professional classes. Malpractice insurance rates are generally less than \$4000.00 per year, indicating the safety of naturopathic treatment as assessed by insurance companies.

Master Insurance Trust reports that of the naturopathic physicians for whom MIT provides liability insurance, there have been only four incidents reported to the company for follow-up. However, nothing has been paid in either settlements or judgments on any of these items. "While this pooling of physicians is much too small to base actuarial considerations, this claims experience is clearly superior." (Jeffrey D. Brunken, Program Manager, MIT, Letter dated May 21, 1990.)

Jury Verdicts Northwest, a legal database which records court cases in Washington and Oregon, the area of the country with the largest number of naturopathic physicians, shows no judgments for malpractice against N.D.s since the database was started in 1983. One in five M.D.s is sued each year in the US (AMA).

Naturopathic methods are less likely to cause injury than orthodox methods. Prudent dietary and lifestyle changes, for instance, are unlikely to cause harm. Naturopathic physicians by philosophy and

training use the least invasive means to treat and prevent disease. This results in less injury to patients. Naturopathic physicians also have excellent diagnostic and referral skills. There is no significant history of complaints against naturopathic physicians resulting from a missed diagnosis, the most common cause for suits in a general practice. From insurance data, it appears that naturopathic physicians as a group know the limits of their methods and refer patients to other practitioners or specialists when appropriate.

Professional Naturopathic Organizations

North American Board of Naturopathic Examiners/ Naturopathic Physicians Licensing Examinations

Executive Director: Christa Louise
P.O. Box 69657
Portland, OR 97201
Telephone: 503-250-9141

Council on Naturopathic Medical Education

P.O. Box 11426
Eugene, OR 97440-3626
Phone 541-484-6028
Executive Director: Robert Lofft
E-mail: din@cnme.org
<http://www.cnme.org>

State and Provincial Naturopathic Licensing Agencies

Alaska Department of Commerce & Economic Development

Division of Occupational Licensing
Naturopathic Section
P.O. Box 110806
Juneau, AK 99811-0806
Licensing Examiner: P.J. Gingras
Telephone: 907-465-2695
E-mail: [P.J. Gingras@commerce.state.ak.us](mailto:P.J._Gingras@commerce.state.ak.us)

Arizona Naturopathic Physicians Board of Medical Examiners

1400 W. Washington, Room 230
Phoenix, AZ 85009

Executive Director: Craig Runbeck, N.D.
Telephone: 602-542-3095
E-mail: goodnmd@aol.com

Board of Governors

Association of Naturopathic Physicians of British Columbia
409 Granville St., Suite 218
Vancouver, BC V6C 1T2
Canada

Executive Director: Ms. Carolyn Chiasson
Telephone: 604-688-8236
Fax: 604-688-8476
E-mail: anpbc@msn.com

Connecticut Board of Naturopathic Examiners

Connecticut Department of Public Health
410 Capitol Ave., MS# 12APP
P.O. Box 340308
Hartford, CT 06134-0308
Contact: Jackie Leduc
Telephone: 860-509-7563

Hawaii Board of Examiners in Naturopathy

P.O. Box 3469
Honolulu, HI 96801
Executive Officer: Candace Ito Telephone: 808-593-9445

Email: naturopathy@dcc.state.hi.us

Maine Board of Complementary Health Care Providers

35 State House Station
Augusta, ME 04333
Contact: Ms. Jerri Betts
Telephone: 207-624-8625

Montana Alternative Health Care Board

Department of Commerce
Professional and Occupational Licensing Division
111 N. Jackson St.
Helena, MT 59620

Program Manager: Ms. Cheryl Brandt
Telephone: 406-444-5436

New Hampshire Naturopathic Board of Examiners

Department of Health and Human Services
6 Hazen Dr.
Concord, NH 03301-6527
Contact: Ms. Christine Topham
Telephone: 603-271-5127

Ontario Board of Drugless Therapy-Naturopathy

4195 Dundas St. W., Suite 206
Etobicoke, ON M8X 1Y4
Canada
Office Administrator: Ms. Jane Lowe
Telephone: 416-236-4593

Oregon Board of Naturopathic Examiners

800 NE Oregon St., Room 21
Portland, OR 97232
Executive Director: Kathy Soderberg
Telephone: 503-731-4045
E-mail: internet.orgovt:Kathy.SODERBERG@state.or.us

Puerto Rico Naturopathic Licensing

Department of State
P.O. Box 9023271
San Juan, PR 00902-3271
Contact: Francis Perez
Fax: 787-725-7303

Utah Division of Occupational & Professional Licensing

Naturopathic Physicians
P.O. Box 146741
Salt Lake City, UT 84114-6741
Contact: David Fairhurst
Telephone: 801-530-6551

Vermont Secretary of State Professional Regulations

26 Terrace Redstone Building

Montpelier, VT 05602
Telephone: 802-828-2363

Washington State Naturopathic Physician Licensing Program

1300 Quince St.
P.O. Box 47860
Olympia, WA 98504-7860
Executive Director: Robert J. Nicoloff
Telephone: 360-664-9093

National Organizations

American Association of Naturopathic Physicians

3201 New Mexico Avenue N.W.
Suite 350
Washington DC 20016
Executive Director: Karen Howard
Telephone: 202-895-1392
Fax: 202-274-1992
E-mail: info@naturopathic.org
<http://www.naturopathic.org>

Canadian Naturopathic Association

4174 Dundas St. W., Ste.304
Etobicoke, Ontario M8X 1X3
Telephone: 416-233-1043
Toll-free: 877-628-7284
Fax: 416-233-2924
Coordinator: Cass Lyon, MA
E-mail: info@naturopathicassoc.ca
<http://www.naturopathicassoc.ca>

State/Province Organizations

American College of Naturopathic Obstetricians

4444 SW Corbett Ave., Portland, OR 97201
Contact: Susan Roberts, N.D.
Telephone: 503-224-4003
E-mail: WNHC@aol.com
<http://www.acno.org>

British Columbia of Naturopathic Association

204--2786 W 16th Ave

Vancouver, BC, Canada, V6K 3C4
Telephone: 604-736-6646
Fax: 604-736-6048
Executive Director: Glenn Cassie
E-mail: bcna@portal.ca
<http://www.bcna.bc.ca>

Ontario Association of Naturopathic Doctors

4147 Dundas St. W., Ste.304
Etobicoke, Ontario M8X 1X3
Telephone: 416-233-2001
<http://www.oand.com>

Manitoba Naturopathic Association

459 William Ave.
Winnipeg, Manitoba, Canada, R3A0J5
Telephone: 204-943-8632

Alberta Naturopathic Association

P.O. Box 21142
665 Eighth St SW
Calgary, Alberta T2P4H5
Telephone: 403-266-2446
Fax: 403-243-5308

Nova Scotia Naturopathic Association

P.O. Box 825
Berwick, Nova Scotia B0P 1E0
Telephone: 902-538-8733

Quebec Association of Naturopathic Medicine

1173 Mount Royal Blvd.
Outremont, Quebec H2V 2H6
Telephone: 514-279-6629

Saskatchewan Naturopathic Association

624 1st Ave NW
Moose Draw, Saskatshewan S6H 3M6
Telephone: 306-691-4040
E-mail: Dougamell@sk.sympatico.ca

